

## Response to the Doe Run Summary Statements on Recent Sampling Results

Although The Doe Run Company claims to have sampled 394 properties in Herculaneum, they have only provided the EPA with sampling results for 372 properties. EPA notified Doe Run on October 22<sup>nd</sup> of this discrepancy and requested they contact us to resolve it. As of xxx, Doe Run has not responded to our request.

The statement that Doe Run continues to make, "29 of 394 properties had an average soil lead concentration above 400 ppm" may be accurate, but is irrelevant when assessing the need to remove lead-contaminated soil from a yard. That's because, since 2001, EPA policy at the Site (that Doe Run has also implemented) is to subdivide a yard into smaller areas referred to as exposure units. Most yards are divided into 5 to 7 exposure units and then a composite soil sample is collected from each unit. If any one exposure unit of a yard is determined to have a lead concentration in surface soil exceeding 400 ppm, it is considered an unacceptable health risk that requires a response action; typically surface soil replacement. This has been the soil remediation policy at the site since the implementation of the 2001 AOC.

19 of the 104 properties where one or more exposure units contain a surface soil lead concentration at or above 400 ppm are located within the voluntary property purchase area.

27 of the 129 contaminated properties have lead contamination exceeding 400 ppm in gravel driveways or gravel areas. 20 of these properties have been remediated and 2 have refused excavation since 2001.

13 of the driveway/gravel properties have only lead contamination in the gravel. (3 of the 13 are presumed to be gravel areas other than the driveway.) EPA records indicate that 6 of the driveways have had their driveway gravel remediated sometime during the past 8 years, and 1 property was determined to have lead contamination below 400 ppm when it was last sampled in 2002.

Of the remaining 14 properties that have lead contaminated gravel, only one has not been remediated within the past 9 years.

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